

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska) Application No. 911-017/PI-116
Public Service Commission, on)
its own motion, to establish interim)
policies for the Administration of)
the Enhanced Wireless 911 Fund)
pending implementation of LB 1222)
[2006].)

**COMMENTS OF
N.E. COLORADO CELLULAR, INC.,
d/b/a VIAERO WIRELESS**

N.E. Colorado Cellular, Inc. d/b/a Viaero Wireless (“Viaero”) welcomes this opportunity to comment on the Commission’s proposed interim policy for the Enhanced Wireless 911 Fund (“Fund”).

Viaero supports the Commission’s proposal to put in place a temporary policy that will help direct funds to highest-priority uses as the Commission considers a permanent mechanism pursuant to the legislative directives in LB 1222. Given the Commission’s need to conduct a comprehensive rulemaking to implement the new legislation, it is appropriate to establish an interim policy that “balances the need to properly manage the limited funds available and the importance of continuing to implement wireless enhanced 911 during this transition period.”¹

Viaero believes the Commission's proposal would appropriately strike this balance. By limiting the use of funds to those costs directly related to the provision of

¹ In the Matter of the Nebraska Public Service Commission, on its own motion, to establish interim policies for the Administration of the Enhanced Wireless 911 Fund pending Implementation of LB 1222 [2006], Application No. 911-017/PI-116, Order Opening Docket, Seeking Written Comments and Scheduling Hearing (June 6, 2006) at p. 2.

wireless enhanced 911, and by giving Phase I implementation priority over Phase II, the interim policy would help limit payouts and ensure the sustainability of the Fund until a new funding mechanism is in place. At the same time, the interim policy would properly emphasize statewide rollout of Phase I wireless enhanced 911.

The impact of the proposed interim policy on implementation timelines for wireless enhanced 911 will be positive. While the implementation of Phase II is an important goal, Viaero submits that Phase I readiness must first be addressed. In Nebraska as in many other states, Phase I wireless enhanced 911 is far from ubiquitously available – according to a recent report issued by the United States Government Accountability Office, only 60% of Nebraska counties had it as of January 2006.² Phase I, which permits a party to be located within a cell site, or a sector of a cell site, is very useful in rural areas, especially because the vast majority of 911 callers can identify generally where they are. In a rural setting, such as western Nebraska, a simple description (“I’m on Highway 80”), combined with Phase I data, is often enough to permit emergency responders to locate the caller. Viaero supports the Commission’s proposal to redirect funds on an interim basis in a way that makes statewide rollout of Phase I the top priority.

Conclusion

For the reasons set forth above, Viaero supports the Commission’s proposed interim policy for wireless enhanced 911 funding requests pending its implementation of LB 1222.

² States’ Collection and Use of Funds for Wireless Enhanced 911 Services, GAO-06-338 (March 2006).

Respectfully submitted this 30th day of June, 2006.

**N.E. COLORADO CELLULAR, INC.,
d/b/a VIAERO WIRELESS**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of June, 2006, an original, five copies and an electronic copy of the Comments of N.E. Colorado Cellular, Inc., d/b/a Viaero Wireless, in Application No. 911-017/PI-116 were hand delivered to:

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